

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Full-Fill Industries
Attn: Jonathon Clapp
400 N. Main Street
Henning, Illinois 61848

Application No.: 11120012

Applicant's Designation:

Subject: Cooking Sprays

Date Issued:

Location: 400 North Main Street, Henning, Vermilion County

I.D. No.: 183040AAE

Date Received: December 8, 2011

Expiration Date:

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of propellant gassing from six (6) cooking spray production lines, two (2) 18,000 gallon pressure storage tanks, two (2) 3,600 gallon pressure storage tanks, two (2) 6,565 gallon pressure storage tanks, and one (1) 18,253 gallon pressure storage tank pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
3. This permit is issued based on the two (2) 18,000 gallon hydrocarbon propellant storage tanks (#1 and #7) and 18,253 gallon hydrocarbon propellant storage tank #6 not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60 Subpart Kb. Pursuant to 40 CFR 60.110b(d)(2), pressure vessels designed to operate in excess of 204.9 kPa (29.7 psi) and without emissions to the atmosphere are not subject to 40 CFR 60 Subpart Kb.
4. This permit is issued based on the propellant gassing not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE because the cooking spray production lines are not located at, or is part of, a major source of HAP emissions.
- 5a. This permit is issued based on the two (2) 18,000 gallon hydrocarbon propellant storage tanks (#1 and #7) and 18,253 gallon hydrocarbon propellant storage tank #6 not being subject to the requirements of 35 Ill. Adm. Code 215.121 (Storage Containers) because the capacity of each tank is less than 151 cubic meters (40,000 gal).
- b. Pursuant to 35 Ill. Adm. Code 215.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
6. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 7a. Emissions and operation of the cooking spray production lines shall not exceed the following limits:

Throughput		Emission Factor (Gallons/Can)	VOM Emissions	
(Cans/Mo)	(Cans/Yr)		(Tons/Mo)	(Tons/Yr)
22,000,000	220,000,000	0.29	7.03	70.26

These limits are based on a VOM emission factor from the Undercup Filler Propellant Loss Study, April 30, 1995 and maximum operation.

- b. This permit is issued based on negligible emissions of volatile organic material from seven storage tanks. For this purpose emissions from

each storage tank shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.

- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 8. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the propellant gassing from cooking spray production lines 4, 5 and 6 being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of Clean Air Act.
- 9. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 10a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
 - i. The throughput for the cooking spray production lines (cans/month and cans/year);
 - ii. Material throughput for the storage tanks (gallons/month and gallons/year);

- iii. Material true vapor pressure for materials stored in tanks; and
 - iv. Monthly and annual emissions of VOM and HAPs (individual and combined) from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 11a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

It should be noted that the three (3) natural gas-fired steam boilers (2.1, 2.1, and 1.47 mmBtu/hr), two (2) natural gas-fired pressure washers (0.67 mmBtu/hr each), three (3) natural gas-fired HW boilers (0.2 mmBtu/hr, each) and two (2) natural gas-fired on demand water heaters (0.2 mmBtu/hr each) are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(c).

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If you have any questions on this, please call David Hulskotter at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:DWH:

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the cooking spray production facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)
	<u>VOM</u>
Cooking Spray Production Lines	70.26
7 Storage Tanks	<u>3.08</u>
Totals	73.62